

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA**

NATCO PHARMA LIMITED,)	
)	
Applicant,)	Civil Action File No.
)	
v.)	
)	
DIGITALOCEAN, LLC)	
)	
Respondent.)	

DECLARATION OF Madineedi Adinarayana

I, Madineedi Adinarayana, declare under penalty of perjury as follows:

1. My name is Madineedi Adinarayana. I am over 60 years of age, and if called to testify in Court or other proceeding I could and would give the following testimony, which is based upon my own personal knowledge unless otherwise stated.
2. I am the Company Secretary & Vice President (Legal & Corporate Affairs) at Natco Pharma Limited. I am authorized to act on Natco Pharma Limited's behalf to protect its exclusive rights in its copyrighted content.
3. I have read and attest to the accuracy of the Request for Identity of Infringers Pursuant to 17 U.S.C. §512(h) related to Natco Pharma Limited's request for a subpoena to DigitalOcean, Inc.
4. The law firm Merchant & Gould P.C. is authorized to act on Natco Pharma Limited's behalf with respect to copyright matters, including copyright matters under the Digital Millennium Copyright Act.
5. The purpose for which the subpoena is sought is to obtain the identity



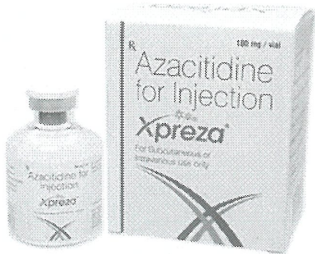
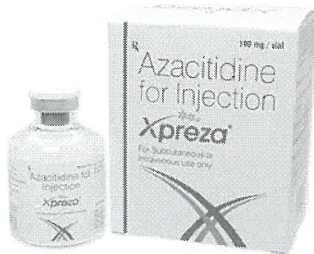
of an alleged infringer and that such information will only be used for the purpose of protecting rights under title 17 of the United States Code.

6. A user of the trading site www.tradeindia.com that goes by the names Mr. M. Srikanth and Mr. Ashok and using addresses of Natco House, Road No.2, Banjara Hills, Hyderabad, Telangana, 500034, India and Plot No. 70, Block D, Okhla Industrial Area Phase I, New Delhi 110020 uploaded detailed that infringed on Natco's intellectual property rights.

7. The contact information provided by the alleged Mr. M. Srikanth name is false and the information provided by Mr. Ashok name is not accurate as it is merely a storage depot. The user appears to have created multiple accounts on the trading site www.tradeindia.com.

8. The user has taken images from Natco's online website and placed those images on the trading site www.tradeindia.com.

9. Examples of the photographs owned by Natco Pharma Limited and listed on Natco's website are depicted on the left side of the table below. Images taken by the user and listed on the trading site www.tradeindia.com are provided on the right side of the table below. URLs indicating the location are included:

Natco Website / Images	Trade India Website / Copies
 https://www.natcopharma.co.in/wp-content/uploads/2015/02/Xpreza.jpg	 https://tiimg.tistatic.com/fp/1/003/395/xpreza-100mg-727.jpg

 <p>https://www.natcopharma.co.in/wp-content/uploads/2015/02/Rasburnat.jpg</p>	 <p>https://tiimg.tistatic.com/fp/1/003/395/rasburnat-718.jpg</p>
 <p>https://www.natcopharma.co.in/wp-content/uploads/2015/02/alphalan.jpg</p>	 <p>https://tiimg.tistatic.com/fp/1/003/395/alphalan-tablets-668.jpg?tr=n-w200</p>

10. The webpages listing the foregoing content include at least the following:

- <https://www.tradeindia.com/Seller-6530100-Natco-Pharma-Ltd-/>
- <https://www.tradeindia.com/fp3395837/Azacitidine.html>
- <https://www.tradeindia.com/fp3395718/Rasburnat.html>
- <https://www.tradeindia.com/fp3395668/Alphalan-Tablets.html>

11. Further, the website at <https://www.tradeindia.com/Seller-24914124-Natco/product-services.html> appears to be related to the user who is using Natco's information to sell products via the trading site www.tradeindia.com.

12. Natco contacted the trading site www.tradeindia.com and learned that the user performed activity via the trading site www.tradeindia.com using the IP addresses 139.59.25.86 and 139.59.17.146, which are operated by DigitalOcean, Inc.

Pursuant to 28 U.S.C., Section 1746, I declare under penalty of perjury under the

Laws of the United States of America that the foregoing is true and correct.

Respectfully submitted this 5th day of October, 2020.

For NATCO Pharma Limited

/s/

M. Adinarayana

M. ADINARAYANA
Company Secretary &
Vice President (Legal & Corp Affairs)

